

SEARS HOLDINGS

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COMMUNITY
DEVELOPMENT

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June 11, 2009

Mr. George Malina, Chair
Members of the Planning Commission
Tukwila City Hall
6200 Southcenter Boulevard
Tukwila, WA 98188

RE: Tukwila Urban Center Subarea Plan

Dear Chair Malina and Members of the Planning Commission,

Thank you for the time you have taken to review the Tukwila Urban Center Subarea Plan ("Subarea Plan") and weigh stakeholder input. Sears, Roebuck and Company ("Sears") appreciates the opportunity to continue to participate in the process and looks forward to the Planning Department's rewrite of the plan. Sears submits this letter in supplement to its comment letter dated May 28, 2009.

As the public comments have evidenced, the Subarea Plan is complex in its impacts on present and future uses in the subject area. While many stakeholders, including Sears, have applauded aspects of the plan vision, many have cautioned that the realities of the real estate market require a phased and careful transition. The plan details are numerous and the stakes are high for retailers like Sears, for property owners like Westfield and for the City.

As stated in our comment letter, the expansive breadth of the Subarea Plan warrants a process that allows for close and careful review and further in-depth analysis. We believe staff will be better prepared to rewrite the plan following, or in conjunction with, a stakeholder task force that includes Sears and other retailers, Westfield, other Tukwila businesses, Planning Commission members, and staff. Two-way communication and collaboration with stakeholders will facilitate the development of economically viable implementation strategies, long-term development regulations that are sensitive to existing users, and an overall plan that is ultimately more successful for all involved. Sears would like to be a part of such a task force.

EXHIBIT 14 DATE 6/10/09
PROJECT NAME TUC Plan
FILE NO 09-008

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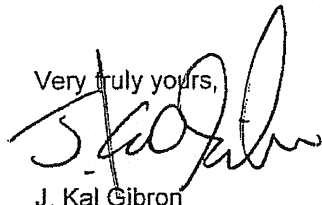
We would encourage the stakeholder task force and rewrite process to address the following key issues:

- Updated and thorough economic analysis of the plan vision, relative to the plan area, with specific attention to the economic impacts on retailers
- Impacts on retailers whose use and/or space is rendered non-conforming
- Impacts on retailers from new parking constraints
- Impacts on retailers from new traffic circulation patterns and likely congestion
- Impacts on retailers from constraints on potential store expansion
- Impacts on retailers from constraints on exterior and interior alterations
- Grandfathering of existing conditions
- Compliance with legal process, procedural and substantive
 - GMA
 - SEPA
 - Public participation
- Opportunities to adopt a more market-sensitive transition strategy

While the above list may not contain all issues raised by the Subarea Plan, it does serve as the focal point of many of our concerns. Some issues may be easily addressed; others may require a more in depth policy discussion. Again, we believe a stakeholder task force offers an excellent vehicle to address and resolve these and other issues.

Sears understands the magnitude of the task at hand. Please consider us a resource. We operate more than 3,900 full-line and specialty retail stores throughout North America. In many locations, we have participated in the redevelopment of a retail district. While each site has unique opportunities and challenges, all share a common thread to which best practices can be applied. We value our relationship with Tukwila and are ready, willing and able to provide assistance.

Very truly yours,



J. Kal Gibron
Divisional Vice President

cc: The Honorable Mayor Jim Hagerton
The Honorable Community Affairs and Parks Committee Chair Verna Griffin

STAO

EXHIBIT

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